

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

vs.

Case Number: 1:12-cv-00257-JB-LFG

LARRY GOLDSTONE, CLARENCE G. SIMMONS,
III, and JANE E. STARRETT,

Defendants.

NOTICE OF COMPLETION OF BRIEFING

Pursuant to D.N.M. LR-Civ 7.4(e), Defendants Larry Goldstone, Clarence G. Simmons, III, and Jane E. Starrett notify the Court that briefing is complete on Defendants' Motion to Compel Non-Party KPMG to Produce Documents and a Privilege Log. The entire briefing consists of the following:

1. Defendants' Motion to Compel Non-Party KPMG to Produce Documents and a Privilege Log [Doc. 208] filed September 6, 2013;
2. Non-Party KPMG's Response in Opposition to Motion to Compel Production of Documents and a Privilege Log [Doc. 213] filed September 23, 2013; and
3. Reply in Support of Defendants' Motion to Compel Non-Party KPMG to Produce Documents and a Privilege Log [Doc. 224] filed October 10, 2013.

The briefing is now complete, and Defendants' Motion to Compel Non-Party KPMG to Produce Documents and a Privilege Log is ready for decision.

Dated: October 11, 2013

Respectfully submitted,

/s/ Christopher W. Johnstone .
WILMER CUTLER PICKERING HALE AND
DORR LLP
Christopher W. Johnstone
950 Page Mill Road
Palo Alto, CA 94304
Telephone: (650) 858-6147
Facsimile: (650) 858-6100
chris.johnstone@wilmerhale.com

*Attorneys for Defendants Larry Goldstone and
Clarence G. Simmons, III*

/s/ Jerry L. Marks .
MILBANK, TWEED, HADLEY & MCCLOY
LLP
Jerry L. Marks
601 S. Figueroa Street, 30th Floor
Los Angeles, CA 90017
Telephone: (213) 892-4000
Facsimile: (213) 629-5063
jmarks@milbank.com

Attorneys for Defendant Jane E. Starrett

/s/ Andrew G. Schultz .
RODEY, DICKASON, SLOAN, AKIN & ROBB,
P.C.
Andrew G. Schultz
P. O. Box 1888
Albuquerque, NM 87103
Telephone: (505) 765-5900
Facsimile: (505) 768-7395
aschultz@rodey.com

*Attorneys for Defendants Larry Goldstone,
Clarence G. Simmons, III, and Jane E. Starrett*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 11, 2013 the foregoing Notice of Completion of Briefing was electronically filed with the Clerk of Court using the CM/ECF system that that will send notification of such filing to all counsel of record.

Michael H. Hoses
Assistant United States Attorney
P.O. Box 607
Albuquerque, NM 87103
michael.hoses@usdoj.gov

Stephen C. McKenna
Gregory Kasper
Dugan Bliss
Securities & Exchange Commission
1801 California Street, Suite 1500
Denver, CO 80202
mckennas@sec.gov
kasperg@sec.gov
blissd@sec.gov

MILBANK, TWEED, HADLEY &
MCCOY LLP
Thomas A. Arena
1 Chase Manhattan Plaza
New York, NY 10005
Telephone: (212) 530-5000
Facsimile: (212) 530-5219
tarena@milbank.com

WILMER CUTLER PICKERING
HALE AND DORR LLP
John A. Valentine
April N. Williams
1875 Pennsylvania Avenue, NW
Washington, DC 20006
Telephone: (202) 663-6000
Facsimile: (202) 663-6363
john.valentine@wilmerhale.com
april.williams@wilmerhale.com

MILBANK, TWEED, HADLEY &
MCCLOY LLP
Jerry L. Marks
Robert J. Liubicic
Alisa Schlesinger
Elena Kilberg
601 S. Figueroa Street, 30th Floor
Los Angeles, CA 90017
Telephone: (213) 892-4000
Facsimile: (213) 629-5063
jmarks@milbank.com
rliubicic@milbank.com
aschlesinger@milbank.com
ekilberg@milbank.com

WILMER CUTLER PICKERING
HALE AND DORR LLP
Randall R. Lee
Jessica F. Kurzban
350 South Grand Ave., Suite 2100
Los Angeles, CA 90071
Telephone: (213) 443-5300
Facsimile: (213) 443-5400
randall.lee@wilmerhale.com
jessica.kurzban@wilmerhale.com

WILMER CUTLER PICKERING
HALE AND DORR LLP
Christopher W. Johnstone
Alanna G. Buchanan
950 Page Mill Road
Palo Alto, CA 94304
Telephone: (650) 858-6000
Facsimile: (650) 858-6100
chris.johnstone@wilmerhale.com
alanna.buchanan@wilmerhale.com

RODEY, DICKASON, SLOAN, AKIN &
ROBB, P.A.

Andrew G. Schultz

Bruce D. Hall

Jessica R. Terrazas

201 3rd Street NW, Suite 2200

P.O. Box 1888

Albuquerque, NM 87102

aschultz@rodey.com

bhall@rodey.com

jterrazas@rodey.com

WILMER CUTLER PICKERING HALE AND DORR LLP

By /s/ April N. Williams
April N. Williams